

1 Ali S. Razai (SBN 246,922)
ali.razai@knobbe.com
2 Sean M. Murray (SBN 213,655)
sean.murray@knobbe.com
3 Jacob R. Rosenbaum (SBN 313,190)
jacob.rosenbaum@knobbe.com
4 Christian D. Boettcher (SBN 342,950)
christian.boettcher@knobbe.com
5 **KNOBBE, MARTENS, OLSON & BEAR, LLP**
6 2040 Main Street
Fourteenth Floor
Irvine, CA 92614
7 Phone: (949) 760-0404
Facsimile: (949) 760-9502

Attorneys for Trove Brands, LLC
d/b/a The BlenderBottle Company

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

1 **TO THE COURT AND ALL PARTIES TO THIS ACTION;**

2 **PLEASE TAKE NOTICE** that Plaintiff Trove Brands, LLC d/b/a The BlenderBottle
3 provides the following notice of errata to (i) Plaintiff's Memorandum in Support of Its Opposition
4 to Defendant's Motion to Modify Scheduling Order and Plaintiff's Cross-Motion and (ii) the
5 Declaration of Jacob R. Rosenbaum in Support of Plaintiff's Cross-Motion:

6 On February 26, 2024, Plaintiff filed its Memorandum in Support of Its Opposition to
7 Defendant's Motion to Modify Scheduling Order and Plaintiff's Cross-Motion and the
8 Declaration of Jacob R. Rosenbaum in Support of Plaintiff's Cross-Motion. These documents
9 included a statement that Plaintiff's counsel, Mr. Ali Razai, had travelled to Sacramento prior to
10 learning of Defendant's inability to appear at the claim construction hearing on January 16. This
11 statement was inaccurate. In fact, the evening before the claim construction hearing, Mr. Razai
12 was preparing to board a plane for Sacramento when counsel for Defendant announced that he
13 was unable to attend the hearing. The inaccurate statement was inadvertently included in
14 Plaintiff's memorandum and Mr. Rosenbaum's declaration because of a miscommunication
15 between Mr. Rosenbaum who was handling the opposition to Defendant's motion and Mr. Razai
16 who was handling the Claim Construction hearing. Corrected versions of Plaintiff's
17 memorandum and Mr. Rosenbaum's declaration are attached hereto as "Exhibit A" and "Exhibit
18 B," respectively. The corrected versions are the same as the original versions, except the
19 inaccurate sentence was deleted twice from the memorandum and once from the declaration.

20 Plaintiff's counsel apologizes to the Court and all parties for the error.

21 **KNOBBE, MARTENS, OLSON & BEAR LLP**

23 Dated: March 7, 2024

By: /s/ Jacob R. Rosenbaum

24 Ali S. Razai
25 Sean Murray
25 Jacob R. Rosenbaum
26 Christian D. Boettcher

CERTIFICATE OF SERVICE

I am a citizen of the United States of America, and I am employed in Irvine, California. I am over the age of 18 and not a party to the within action. My business address is 2040 Main Street, Fourteenth Floor, Irvine, California.

On March 7, 2024, I served **PLAINTIFF'S NOTICE OF ERRATA TO ITS
OPPOSITION TO DEFENDANT'S MOTION TO MODIFY SCHEDULING ORDER
AND CROSS MOTION** on defendant TRRS Magnate LLC d/b/a Hydra Cup shown below via
CM/ECF:

MEGHAN PRATSCHLER
meghan@megantheattorney.com
95 3rd St., 2nd Floor
San Francisco, CA 94103-3103
Telephone: (415) 335-9226

CASEY SCOTT MCKAY
casey@mclaw.io
1441 U St. NW, Suite 712
Washington, DC, D.C. 20009
Telephone: (202) 743-1972

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct

Executed on March 7, 2024, at San Diego, California.

/s/ Estefania Munoz
Estefania Munoz